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	U.S. DISTRICT COURT		
	STATES DISTRICT COURT EASTER DISTRICT-WEDISTRICT OF WISCONSIN FILED		
UNITED STATES OF AMERICA,	Redacted TOB MAY 21 P3:14		
Plaintiff,	COPY JON W. SANFILIPPO CASE NO. 08-CR- CLERK		
v. RANDY SANDERS,	[T. 29 U.S.C. § 501(c)] 08 CR-147		
Defendan	ıt.		
INDICTMENT			

THE GRAND JURY CHARGES:

- 1. At all times material to this indictment, Local 20 of the United Steelworkers Union operated at Kaukauna, Wisconsin.
- 2. At all times material to this indictment, Local 20 of the United Steelworkers Union was a labor organization within the meaning of 29 U.S.C. § 402(i).
- 3. At all times material to this indictment, Randy Sanders was employed as an officer of Local 20, specifically the executive vice-president of Local 20.
- 4. Beginning on or about December 1, 2002 and continuing through on or about September 30, 2006, at Kaukauna, in the State and Eastern District of Wisconsin,

RANDY SANDERS,

acting with fraudulent intent, embezzled, stole, and willfully converted to his own use funds of Local 20. He did so by claiming reimbursement from Local 20 for time and pay lost from work at the Thilmany mill in Kaukauna due to having to spend time working on Local 20 business when he well

knew that he had not lost the time and pay from Thilmany that he claimed and, therefore, was not entitled under Local 20's policies to the lost time reimbursement that he claimed.

5. In order to carry out the fraudulent practice alleged in paragraph 4 of this indictment, the defendant made the following claims for time and pay lost on or about the following dates in approximately the following amounts:

Count	Date	Amount
1	July 11, 2003	\$146.56
2	September 11, 2003	\$168.54
3	December 11, 2003	\$188.70
4	January 13, 2004	\$528.36
5	May 13, 2004	\$345.96
6	June 10, 2004	\$230.64
7	October 5, 2004	\$541.36
8	December 16, 2004	\$157.04
9	March 10, 2005	\$307.52
10	September 8, 2005	\$234.12
11	November 10, 2005	\$234.08
12	February 9, 2006	\$156.08
13	March 9, 2006	\$59.70

All in violation of Title 29, United States Code, Section 501(c).

FOREPERSON

Date: 5.20-08

STEVEN M. BISKUPIC United States Attorney